

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

TZVI WEISS, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	Case No. 05-cv-4622 (DLI) (MDG)
	:	
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
	:	
NATAN APPLEBAUM, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	Case No. 07-cv-916 (DLI) (MDG)
	:	
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
	:	

**INDEX OF PAPERS SUBMITTED BY PLAINTIFFS IN OPPOSITION
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Document	Redacted
Plaintiffs' Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment	X
Plaintiffs' Response to Defendant National Westminster Bank's Statement of Material Facts as to Which There Is No Genuine Issue Pursuant to Local Civil Rule 56.1(b)	X
Declaration of Joel Israel in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment	
Plaintiffs' Statement of Material Facts as to Which There Is a Genuine Issue to be Tried Pursuant to Local Civil Rule 56.1(b)	X

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
1	U.S. Department of Treasury Office of Public Affairs August 22, 2003 Release: "U.S. Designates Five Charities Funding Hamas and Six Senior Hamas Leaders as Terrorist Entities." Produced at NWII 000048-53 and also available at: http://www.treasury.gov/press-center/press-releases/Pages/js672.aspx		
2	Federal Register Volume 62, Number 195, October 8, 1997 Notice from the Department of State, Office of the Coordinator for Counterterrorism. Also available at: http://www.gpo.gov/fdsys/pkg/FR-1997-10-08/pdf/97-27030.pdf		
3	Excerpts from NW084649-84859		
4	2003/902/EC, European Council Decision of December 22, 2003		
5	NW214931		
6	NW013636	X	
7	NW052067-73	X	
8	NW191801-6	X	
9	Responses and Objections by Defendant National Westminster Bank PLC to Plaintiffs' Second Set of Interrogatories (Contention Interrogatories)	X	
10	Excerpts from the July 14-15, 2010 Deposition of Michael Hoseason	X	
11	South African National Intelligence Agency – Hamas (Islamic Resistance Movement), September 24, 2001, from http://cryptome.org/za-hamas.htm , attached as Exhibit A to August 25, 2010 Stipulation as to Authenticity	X	
12	"MI5 study 'charity cash link to Hamas'" <i>The Times of London</i> , March 6, 1996, produced at W_S 157762		
13	"Charity's funds are frozen over alleged Hamas link" <i>The Times of London</i> , March 9, 1996, produced at W_S 157765		
14	"Palestinian Charity Funds Frozen Over 'HAMAS Link'" <i>The Guardian</i> , March 9, 1996, produced at W_S 157766		
15	"Roots of Terror: A special report; Alms and Arms: Tactics in a Holy War" <i>The New York Times</i> , March 15, 1996, produced at W_S 157773-9		
16	NW068291-96	X	
17	Excerpts from the October 5, 2010 Deposition of Gerald Matthews	X	
18	Supplemental Responses and Objections by Defendant National Westminster Bank PLC to Plaintiffs' Second Set of Interrogatories (Contention Interrogatories), August 5, 2011		

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
19	Second Supplemental Responses and Objections by Defendant National Westminster Bank PLC to Plaintiffs' Second Set of Interrogatories (Contention Interrogatories), August 16, 2011		
20	NW014516	X	
21	NW016495-500	X	
22	"Close Trust, Israel Pleads; Britain is being asked to clamp down on Palestinian fundraisers" <i>The Guardian</i> , August 7, 1997, produced at W_S 157786-7		
23	"Suicide bombers linked to London" <i>The Sunday Telegraph London</i> , August 17, 1997, produced at W_S 157788		
24	Excerpts from the July 13, 2010 Deposition of Neil Trantum	X	
25	Excerpts from the June 23, 2008 Deposition of Ian Wickens		
26	NW212124		X
27	Excerpts from the July 21, 2010 Deposition of Tony O'Hear	X	
28	Excerpts from the July 12, 2010 Deposition of Douglas Hartley	X	
29	Excerpts from the July 22, 2010 Deposition of Irvine Rodger	X	
30	Excerpts from the June 9, 2010 Deposition of Martin Wiltshear		
31	NW012954		
32	Excerpts from the July 16, 2010 Deposition of Stephen Foster	X	
33	Excerpts from the July 23, 2010 Deposition of Amanda Holt		
34	Excerpts from the October 27, 2010 Deposition of Sonia Gayle		
35	NW052056-66	X	
36	November 19, 2009 Expert Report of Wayne D. Geisser, with Exhibits A, C and D	X	
37	December 28, 2010 Expert Report of Wayne D. Geisser, with Exhibits A-G	X	
38	Excerpts from the June 24-25, 2008 Deposition of Belinda Lane	X	
39	NW013415		
40	NW013416-8	X	
41	NW013279		
42	NW009934-42		X
43	NW052074-91	X	
44	NW008973		X
45	NW012764		X

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
46	NW008981		X
47	NW052412-3		X
48	NW008982		X
49	NW009755-7		X
50	NW052416		X
51	NW214836-47	X	
52	Excerpts from the May 20, 2009 Deposition of Fleur Baugh		
53	NW000233-60		
54	NW052140-76		
55	NW052114-23	X	
56	NW052124-28		
57	NW052133-9	X	
58	NW052415		X
59	NW052416		X
60	Transfers between Interpal and the World Assembly of Muslim Youth: NW012770; NW012771; NW052436-7; NW012776; NW052275; NW052419; NW052272; NW052408; NW012782-3; NW012786-7; NW012294-316; NW012317-339; NW052409; and NW052423		X
61	Transfers between Interpal and Mr. Dahhan: NW052384; NW052380; NW012774; NW012762; NW012775; NW052500; NW052493; NW052411; NW052421; NW052415; NW052406; NW052404; NW052399; NW052401; NW052270; NW012778-79; NW008996; NW012788; NW052287; NW012790-91; NW012792; NW012359; NW012340; and NW012190		X
62	NW012952		
63	NW013939-41	X	
64	U.S. Department of Treasury Office of Public Affairs May 29, 2003 Release: "Treasury Designates Al-Aqsa International Foundation as Financier of Terror Charity Linked to Funding of the Hamas Terrorist Organization" Available at http://www.treasury.gov/press-center/press-releases/Pages/js439.aspx		
65	NW051994-97		
66	NW050721-751		
67	Excerpts from the June 8, 2010 Deposition of Guy Cole		
68	NW012108-128		X

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
69	NW012129-152		X
70	NW010812-3		X
71	NW013248		X
72	December 12, 2002 "Final Notice" from the Financial Services Authority to the Royal Bank of Scotland plc		
73	NW083850-62	X	
74	NW013375	X	
75	NW052105-13	X	
76	Excerpts from May 18, 2011 Deposition of Jon Holland		
77	NW000149-164		
78	Excerpts from NW 013444-78		
79	NW013660-1		X
80	NW013700	X	
81	NW012941		
82	NW013649		X
83	The Charity Commission for England and Wales 2003 Inquiry Report regarding Palestinians Relief and Development Fund		
84	NW016749-50	X	
85	NW014500-4		X
86	NW012976	X	
87	NW014505		X
88	NW014551		X
89	NW013695-7	X	
90	NW017173-8	X	
91	NW213357-8	X	
92	NW066732-5	X	
93	NW155831	X	
94	NW067946-7		
95	NW017133-4		
96	NW017131		
97	NW017179-90	X	
98	NW018476-83	X	
99	Excerpts from Rashumot publications cited in Annex D to the December 8, 2009 Expert Report of Moshe Azoulay ("Rashumot	X	

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
	Publications”)		
100	NW180879-83	X	
101	NW196915-32	X	
102	NW017151-4	X	
103	NW068305-11	X	
104	NW217191		
105	NW017132		
106	NW066732-9	X	
107	NW017109-10		
108	NW017104		
109	NW183380-6		
110	NW053390	X	
111	NW068209-10		
112	NW068211	X	
113	NW068212		
114	NW068197	X	
115	NW066797-9	X	
116	NW068901		
117	NW068331	X	
118	NW200986-201000		X
119	NW068330	X	
120	NW066822-5	X	
121	NW066677-81		
122	NW066847-52		
123	NW066682-6		
124	NW066807-13		
125	NW197097-197102		
126	NW066721-3	X	
127	NW067948-9		
128	NW066758-9	X	
129	NW066701-4	X	
130	NW066777-9	X	

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
131	NW219318-22	X	
132	NW180854-7	X	
133	Fourth Supplemental Responses and Objections by Defendant National Westminster Bank PLC to Plaintiffs' Second Set of Interrogatories (Contention Interrogatories), November 23, 2011	X	
134	NW219323-6	X	
135	NW191807-14	X	
136	NW190202-5	X	
137	NW180811-5		
138	NW190918-20		
139	NW069055-8		
140	NW180808-10		
141	NW066764-9		
142	NW180827-9		
143	NW069060-2	X	
144	NW013815		X
145	Excerpts from the June 8, 2011 Deposition of Gary Walters	X	
146	Printout of Forensic Risk Alliance website "Services" page, available at http://www.forensicrisk.com/Services.aspx?MID=12&PID=2&Cat=Services&CatSubType=Compliance and Risk Management		
147	Excerpts from the December 2-3, 2010 Deposition of Evan F. Kohlmann		
148	Declaration of Evan F. Kohlmann (April 29, 2010)		
149	Excerpts from the November 4, 2010 Deposition of Ronni Shaked		
150	Excerpts from the August 2, 2011 deposition of Ronni Shaked		
151	Excerpts from the June 2, 2011 Deposition of Matthew Levitt		
152	Excerpts from the September 1, 2010 Deposition of Matthew Levitt		
153	CV of Arie Spitz, attached as Appendix 1 to the November 30, 2010 Expert Report of Arie Spitz, with translation		
154	Excerpts from the August 11, 2010 Deposition of Arie Spitz		
155	Excerpts from the July 20, 2011 Deposition of Arie Spitz		
156	Excerpts from the June 10, 2011 Deposition of Brian Jenkins		

	Exhibits to Declaration of Joel Israel	Redact	Under Seal
157	Excerpts from the December 16, 2010 Deposition of Brian Jenkins		
158	RAND Database of Worldwide Terrorism Incidents, Results regarding Bus 19 Attack, available at: http://smapp.rand.org/rwtid/incident_detail.php?id=17934)		
159	Excerpts from the June 14, 2011 Deposition of Clive Walker		
160	Excerpt from the May 20, 2011 Deposition of Jonathan Burchfield		
161	Superseding Indictment, <i>U.S. v. Holy Land Foundation</i> , 04-CR-240 (N.D. Tex. Nov. 12, 2008)		
162	Expert Report of Reuven Paz, <i>Boim v. Quranic Literacy Institute</i> , 00-CV-2905 (N.D.Ill.)		
163	Excerpt from the Administrative Record, <i>Holy Land Foundation v. Ashcroft</i>		
164	Action Memorandum from Dale L. Watson to Richard Newcomb, Director of OFAC, regarding “Holy Land Foundation for Relief and Development International Emergency Economic Powers Act.”		
165	Excerpt from <i>Owens v. Sudan</i> , 01-CV-2224 (D.D.C. Oct. 28, 2010) (Evidentiary Hearing Transcript)		
166	“jihad,” Oxford Dictionaries, U.K. Version (Oxford University Press 2011), http://oxforddictionaries.com/definition/jihad?q=jihad		
167	FATF/GAFI, Guidance for Financial Institutes in Detecting Terrorist Financing (April 24, 2002), available at http://www.fatf-gafi.org/dataoecd/39/21/34033955.pdf		
168	FATF/GAFI, Guidance on the Risk-Based Approach to Combating Money Laundering and Terror Financing (June 2007), available at http://www.fatf-gafi.org/dataoecd/43/46/38960576.pdf		
169	FATF/GAFI, RBA Guidance for Legal Professionals (October 23, 2008), available at http://www.fatf-gafi.org/dataoecd/5/58/41584211.pdf		
170	December 17, 2010 Expert Report of Gary Walters		
171	Excerpt from the July 20, 2011 Deposition of Arie Spitz		
172	“Commission Takes a Charitable View of Terrorism,” <i>Daily Telegraph</i> , March 28, 2009		
173	2009 Charity Commission Inquiry Report regarding Palestinians Relief and Development Fund (Interpal)		